

been rejected under 35 U.S.C. §103(a) as being unpatentable over Sergeant and further in view of WebCam⁺ and RFC 1866 “Hypertext Markup Language – 2.0” and RFC 1738 “Uniform Resource Locators (URL).” Claims 23-34, 41-46 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Blackshear (U.S. Patent No. 5,111,288) and further in view of WebCam⁺, and Niwa (U.S. Patent No. 5,544,046). Applicants respectfully traverse the rejection of these claims, for the reasons set forth below.

A. CLAIMS 1 AND 11:

Claims 1 and 11 are directed to an arrangement in which both a network address of a site and control information for respective image input means of a site are stored. Subsequently, the site may be accessed and controlled by reading and using the stored address and associated control information. In other words, the control information is not stored locally at the site.

On the contrary, Sergeant is directed to a surveillance system including a plurality of remote surveillance units 12 (e.g., 12a, 12b and 12c) coupled to a CPU 28, across a switcher/multiplexer 24.. Each surveillance unit 12 (Fig. 2) includes a video camera having a domed microcontroller 46 which controls the operations of the camera. In operation, a PRESET command may be implemented to have angular coordinates of the camera stored within internal registers of the dome microcontroller 46. See Sergeant, col. 7, lines 52-57. When a RECALL command is received by the surveillance unit 12, the microcontroller 46 positions the camera in accordance with the locally stored and retrieved coordinates. See Sergeant, col. 7, lines 57 et seq. A plurality of coordinates may be stored locally for each surveillance unit 12. See Sergeant, col. 8, lines 1-18. As such, Sergeant provides a system in which control information is

maintained locally at each surveillance unit for subsequent implementation. The Examiner, however, has maintained the rejection under 35 U.S.C. §102(b) “based on the obviousness of setting a bookmark or shortcut to the camera control.” Since claims 1 and 11 have only been rejected under §102(b) as being anticipated by Sergeant rather than §103, Applicants respectfully request that the continued rejection of these claims as anticipated by Sergeant under §102(b) be withdrawn and a response to Applicants’ previous arguments be entered.

B. CLAIMS 23, 30 AND 31:

Independent claims 23 and 31 are directed to an arrangement involving transferring image information with information indicative of a service allowable range of the camera based on a received request.

As acknowledged by the Examiner, Blackshear and WebCam+ do not disclose or suggest any information indicative of a service allowable range of a camera. The Examiner relies upon Niwa to address this deficiencies. However, Niwa is directed to a numerical controller unit for controlling a machining process, which is simply different from the camera control arrangement of the claimed inventions. In Niwa, an operator may provide memo data to define tolerance limits (e.g., an upper and lower limit) for particular data which is employed by a machining program to perform a machining process. The tolerance limits are simply not information indicative of a service allowable range of a camera. Thus, the cited references, individually or in combination, do not disclose or suggest any information indicative of a service allowable range of a camera.

The cited references are also silent as to the transfer of image information with information indicative of a service allowable range of a camera based on a received request. The Examiner now relies on Blackshear as remedying the deficiencies of the cited references as to

this transfer feature. Blackshear, however, does not disclose this feature of the claimed invention. Instead, Blackshear simply describes status information, rather than information indicative of a service allowable range of a camera.

In view of the foregoing, claims 23 and 31 are believed to be patentably distinguishable over the cited references.

C. CLAIMS 32, 33 AND 34:

Claims 32, 33 and 34 are directed to an arrangement involving comparing information indicative of the operable limitation of the camera transferred from the server with the request information and notifying the result of the comparison. The comparison is not performed by the server, but rather at a remote location.

The Examiner asserts that:

Regarding claims 32, 33 and 34, the references teach comparing the value input by the user with the operable range of the device prior to sending the command to the device [see Niwa's fig. 49 and Blackshear's fig. 9]. Hence, it is apparent that the system as modified would check for valid parameters at the client prior to sending it over the network to the camera. See Office Action, pages 3 and 4.

However, Niwa simply shows a numerical controller arrangement which is simply different than the claimed environment with a client, server, camera and general network. Applicants respectfully submit that the Examiner has not addressed with reasonable particularity what is alleged as the client or server in Niwa and which systems or components perform processes described in Fig. 49. Furthermore, Blackshear (e.g., Fig. 9) describes processes performed by a program within the on-board computer that controls the camera functions through the electronic control circuit and not within a "client". See col. 9, lines 31-35. Accordingly, Applicants

respectfully request that the Examiner's rejection of claims 32, 33 and 34 under 35 U.S.C. §103(a) as unpatentable over Blackshear in view of WebCam⁺ and Niwa be withdrawn.

C. CLAIM 21:

Claim 21 is directed to a browser in which control information for image input means of an object site is stored, together with a network address of said site, in a memory. Applicants respectfully submit that the Examiner has appeared to take judicial notice that various features of the claimed invention are known in the relevant art. Applicants submit, however, that the Examiner has not proffered any objective basis for those features of claim 21 that the Examiner submits are known in the art. Accordingly, Applicants respectfully request that the rejection of claim 21 under 35 U.S.C. §103(a) as unpatentable over Sergeant and further in view of WebCam⁺, and RFC 1866 "Hypertext Markup Language – 2.0" and RFC 1738 "Uniform Resource Locators (URLs)" be withdrawn.

D. DEPENDENT CLAIMS:

Applicants respectfully submit that the dependent claims provides additional features that further distinguish over the cited references, individually or in combination. For example, dependent claims 47, 48, 50 and 51 each recite one of the following: (1) the identifier is expressed as part of a path name in the URL, or (2) the identifier is expressed as part of a resource name in the path name in the URL.

The Examiner alleges that the URL syntax of RFC 1738 in section 3.3 may include a pathname and/or resource name. Applicants respectfully submit, however, that there is no indication that the entire <path>?<searchpart> fields serve as a resource name or pathname or that control information would be a part of a pathname or resource name.

For these reasons, these dependent claims are further patentably distinguishable over the cited references.

CONCLUSION

Based on the foregoing remarks, Applicants respectfully request reconsideration and withdrawal of the rejection of claims and allowance of this application.

AUTHORIZATION


The Commissioner is hereby authorized to charge any additional fees which may be required for consideration of this Amendment to Deposit Account No. 13-4503, Order No. 1232-4367US1. A DUPLICATE OF THIS DOCUMENT IS ATTACHED.

In the event that an extension of time is required, or which may be required in addition to that requested in a petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account No. 13-4503, Order No. 1232-4367US1. A DUPLICATE OF THIS DOCUMENT IS ATTACHED.

Respectfully submitted,
MORGAN & FINNEGAN

Dated: October 20, 2003

By:



Gregory Perrone (No. 47855) for
James Hwa
Registration No. 42,680
(202) 857-7887 Telephone
(202) 857-7929 Facsimile

Mailing Address:
MORGAN & FINNEGAN
345 Park Avenue
New York, New York 10154
(212) 758-4800
(212) 751-6849 Facsimile